## IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION

RLI INSURANCE COMPANY,	) C/A No: 6:20-cv-1289-DCC
PLAINTIFF,	)
VS.	) ) PLAINTIFF'S NOTICE OF MOTION
INNOVATIVE EMPLOYER SOLUTIONS, LLC D/B/A	AND MOTION TO AMEND COMPLAINT
PAYROLL+MEDICS AND JOHN DOES	)
1-500,	)
DEFENDANTS.	)

PLEASE TAKE NOTICE that Plaintiff RLI Insurance Company, by and through its undersigned counsel, hereby moves before Judge Coggins for an Order allowing Plaintiff to amend its Complaint. A copy of the proposed Amended Complaint is attached hereto as **Exhibit A**. This Motion is made with the consent of counsel of all Defendants.

Respectfully Submitted,

s/Allen Leland DuPre, Esq.

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